

RONALD SULLIVAN LAW, PLLC

Ronald S. Sullivan Jr.

January 15, 2025

**VIA ECF**

The Honorable Alvin K. Hellerstein  
United States District Court Judge  
United States District Court for the  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Charlie Javice, 23-Cr.-251 (S-1) (AKH)***

Dear Judge Hellerstein,

On behalf of our client, Charlie Javice, we respectfully request that the Court consolidate the hearings on the Government's Motion to Compel [ECF 190] and the Defendant's Motion to Compel Production of Records [ECF 200] with the hearing on Defendant's Motion to Sever [ECF 184] currently set for **January 23, 2025, at 10:00 a.m.** The parties have conferred and counsel for Mr. Amar and for the Government agree Ms. Javice's proposal to consolidate.

Consolidation will promote the interests of judicial economy and increase efficiency for the parties and their counsel. The parties propose an existing hearing setting in order to avoid any inconvenience to the Court, to the extent the Court is amenable. This request does not prejudice any party as all parties are in agreement with this proposal

For the foregoing reasons, Ms. Javice respectfully requests that this Court consolidates the hearings on Defendant's Motion to Sever, the Government's Motion to Compel, and Defendant's Motion to Compel Production of Records into a single proceeding to be held on **January 23, 2025, at 10:00 a.m.**

Dated: January 15, 2025

Respectfully submitted,

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/s/ Ronald Sullivan  
Ronald Sullivan  
Ronald Sullivan Law PLLC  
1300 I Street NW  
Suite 400E  
Washington, DC 20005  
[rsullivan@ronaldsullivanlaw.com](mailto:rsullivan@ronaldsullivanlaw.com)  
(202) 313-8313